

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

**JOHN AND JANE DOE NO. 1, et al.,** : **CASE NO. 3:22-cv-00337**  
: :  
: **Plaintiffs,** : **JUDGE MICHAEL J. NEWMAN**  
: :  
: **vs.** :  
: :  
**BETHEL LOCAL SCHOOL** : **PLAINTIFFS' MOTION FOR**  
**DISTRICT BOARD OF** : **PRELIMINARY INJUNCTION**  
**EDUCATION, et al.,** : **AGAINST DEFENDANTS**  
: :  
**Defendants.** : :

Plaintiffs John and Jane Doe No. 1; Child No. 1A, a minor, by and through her legal guardians John and Jane Doe No. 1; John and Jane Doe No. 2; John Doe No. 3; Child No. 3B, a minor, by and through her legal guardian John Doe No. 3; Child No. 3C, a minor, by and through his legal guardian John Doe No. 3; Jane Doe No. 4; Child No. 4D, a minor, by and through his legal guardian Jane Doe No. 4; Jane Doe No. 5; Child No. 5E, a minor, by and through his legal guardian Jane Doe No. 5; Jane Doe No. 6; Jane Doe No. 7; Child No. 7F, a minor, by and through his legal guardian Jane Doe No. 7; John and Jane Doe No. 8; and John Doe No. 9 respectfully move this Court for a preliminary injunction against Defendants, Bethel Local School District Board of Education, Lydda Mansfield, Lori Sebastian, Natalie Donahue, Danny Elam, Jacob King, and Michael Crispin.

Defendants violated the Ohio Open Meetings Act (the “Act”). They adopted a new rule in secret without public deliberation and took official action without doing

so in an open meeting. The Act declares such action invalid. Preliminary injunctive relief is therefore proper in this case, including an injunction that prevents Defendants from enforcing the invalid rule during the pendency of this dispute. The reasons for this motion are set forth more fully in the attached Memorandum in Support of Plaintiffs' Motion for Preliminary Injunction.

Dated: December 2, 2022

Respectfully submitted,

s/ Joseph P. Ashbrook  
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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of December, 2022, I served a copy of the foregoing via email on the Bethel attorney to whom I sent Plaintiffs' request for waiver of service of the summons and that all other filings in the action have been served on the same attorney for:

Bethel Local School District Board of Education  
7490 Oh-201  
Tipp City, Ohio 45371

Lydda Mansfield  
7490 Oh-201  
Tipp City, Ohio 45371

Lori Sebastian  
7490 Oh-201  
Tipp City, Ohio 45371

Natalie Donahue  
7490 Oh-201  
Tipp City, Ohio 45371

Danny Elam  
7490 Oh-201  
Tipp City, Ohio 45371

Jacob King  
7490 Oh-201  
Tipp City, Ohio 45371

Matthew Chrispin  
7490 OH-201  
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s/ Joseph P. Ashbrook  
Attorney for Plaintiffs